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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION  
13

14 UNITED STATES OF AMERICA,	)	Case No. CR 12-0420 EMC
	)	
15 Plaintiff,	)	STIPULATION AND [ <del>PROPOSED</del> ]
	)	PROTECTIVE ORDER
16 v.	)	
	)	
17 KARIM ISKANDER BAYYOUK,	)	
	)	
18 Defendant.	)	
	)	
19 _____	)	

20  
21 STIPULATION

22 The United States and the defendant in this action, through undersigned counsel, hereby stipulate  
23 and agree as follows:

24 1. The United States is prepared to produce to the defendant witness statements and reports  
25 governed by 18 U.S.C. § 3500, including grand jury testimony, and other grand-jury matters in advance  
26 of trial.

27  
28 STIPULATION & [~~PROPOSED~~] ORDER  
CR 12-0420 EMC

2. Federal Rule of Criminal Procedure 6(e)(3)(E) provides that the Court “may authorize disclosure – at a time, in a manner, and subject to any other conditions that it directs – of a grand-jury matter: (i) preliminary to or in connection with a judicial proceeding.” The parties request that the Court issue an order authorizing such disclosure.

3. Possession of copies of the witness statements and reports shall be limited to the defendant and his attorneys, including any investigators, paralegals, law clerks, assistants, and other persons who are within the attorney-client privilege (hereinafter collectively referred to as “members of the defense team”). The defendant, his attorneys, and members of his defense team shall use the witness statements and reports only for the purpose of defending against the allegations in the Indictment. The defendant, his attorneys, and members of his defense team shall not provide copies of the witness statements and reports to other persons.

4. At the conclusion of this proceeding, the defendant, his attorneys, and members of his defense team shall return to the government all copies of the witness statements and reports.

STIPULATED AND AGREED TO:

DATED: June 11, 2013

MELINDA HAAG  
United States Attorney

\_\_\_\_\_/s/\_\_\_\_\_  
ADAM A. REEVES  
ROBERT S. LEACH  
Assistant United States Attorneys

DATED: June 11, 2013

LAW OFFICES OF BRIAN H. GETZ

\_\_\_\_\_/s/\_\_\_\_\_  
**BRIAN H. GETZ, ESQ.**  
 Counsel for Defendant  
 Karim Iskander Bayyounk

1  
2 ORDER

3 In light of the stipulation and agreement of the parties to this action, and good cause appearing, it  
4 is HEREBY ORDERED that the United States is authorized to disclose grand-jury matters to the  
5 defendant, including the grand jury testimony of witnesses intended to be called at the trial. It is  
6 FURTHER ORDERED that use of any witness statements and reports produced by the United States  
7 shall be restricted as set forth in Paragraphs 3 through 4 above.

8  
9  
10 Dated: July 2, 2013 \_\_\_\_\_

